

OCT 18 2007

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DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 10/19/07

October 18, 2007

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Honorable Alvin K. Hellerstein
 United States District Judge
 United States Courthouse
 500 Pearl Street
 New York, New York 10007

JOINT APPLICATION

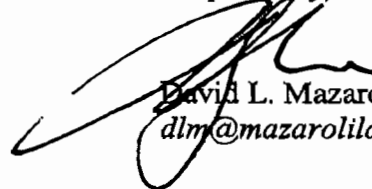
Re: Royal & Sun Alliance Insurance PLC
 v. Ocean World Lines, Inc.
 07 Civ. 2889 (AKH)
 Our File: 7XHD-1477

Dear Judge Hellerstein:

I represent the plaintiff in this action which involves a claim for damage to cargo. As discussed at the initial court conference, there are threshold legal issues concerning the law which applies to the domestic land stage of the multimodal transport. In addition, certain defendants claim the benefit of a foreign forum selection clause in one of the two bills of lading. While it is likely motion practice will be necessary, counsel would like to continue discussions to see if an alternative course of action is possible. For this reason counsel join in respectfully requesting a three-week adjournment of the October 19, 2007 court conference. The Court's attention is appreciated.

MEMO ENDORSED

Respectfully,


 David L. Mazaroli
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DLM/jcf

cc: Clark Atcheson & Reisert
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Coy. Adjourned to
Nov. 16, 2007, 9:30 a.m.
10-18-07
Al K. Hellerstein